

The Amin Law Group, NV., Ltd.  
3960 Howard Hughes Parkway, Suite 500  
Las Vegas, NV 89109  
Phone: (702) 990-3583 / Fax: (702) 990-3501

Ismail Amin, Esq. (NV Bar No. 9343)  
Lawrence Kulp, Esq. (NV Bar No. 7411)  
Breane Stryker, Esq. (NV Bar No. 13594)  
**THE AMIN LAW GROUP, NV., LTD.**  
3960 Howard Hughes Parkway, Suite 500  
Las Vegas, Nevada 89169  
Telephone: (702) 990-3583  
Facsimile: (702) 990-3501  
*Attorneys for Plaintiff, ABBEY DENTAL CENTER, INC.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ABBEY DENTAL CENTER, INC., a Nevada  
Corporation,

Plaintiff,

vs.

CONSUMER OPINION LLC, a Nevada  
Limited liability company; DOES 1-10; and  
ROE ENTITIES 1-10, inclusive,

Defendant(s).

) Case No. 2:15-cv-02069-GMN-PAL  
)  
) **STIPULATION AND (PROPOSED)**  
) **ORDER TO STAY PROCEEDINGS**  
) **(2<sup>nd</sup> Request)**

Plaintiff, ABBEY DENTAL CENTER, INC., and Defendant, CONSUMER OPINION  
LLC, by and through their respective, undersigned counsel, do hereby stipulate and agree as  
follows:

1. The aforesaid parties are currently actively engaged in settlement negotiations.
2. On January 6, 2016, the parties stipulated to stay the proceedings in this matter  
for thirty (30) days, in order to allow the parties to facilitate settlement.

1           3.     The Court entered the parties' stipulation as an Order on January 14, 2016.

2           4.     The Court's Order is due to expire on February 5, 2016.

3           2.     As settlement discussions continue, and in an effort to facilitate those efforts,  
4 as well as to minimize attorneys' fees and other legal expenses, the parties believe that the  
5 present civil action should be stayed for an additional thirty (30) days.

6           3.     Therefore, the parties agree that the Court may enter the following Order and  
7 request that the Court do so accordingly:

8                 a.     Except as otherwise provided below, this action shall be stayed for a  
9 period of thirty (30) days from the date this stipulation is filed with the Court.

10                b.     The stay shall immediately terminate upon Plaintiff's filing with the  
11 Court, and serving upon Defendant, a notice that Defendant must file an answer to Plaintiff's  
12 complaint in this action or otherwise respond to same in accordance with the *Federal Rules of*  
13 *Civil Procedure* and by no later than twenty-one (21) days after service of the notice.

14     //

15     //

16     //

17     //

18     //

19     //

20     //

21     //

22     //

23     //

1 c. The parties stipulate that nothing in this delay shall be deemed to prejudice  
2 Defendant's right to file an Anti-SLAPP motion, under NRS 41.635 *et. seq.*

3 **SO STIPULATED AND AGREED** on this 3<sup>rd</sup> day of February, 2016.

4 **THE AMIN LAW GROUP, NV., LTD.**

**RANDAZZA LEGAL GROUP, PLLC**

5  
6 /s/Ismail Amin, Esq.  
7 ISMAIL AMIN, ESQ.  
8 Nevada Bar No. 9343  
9 3960 Howard Hughes Parkway, Suite 500  
10 Las Vegas, Nevada 89169  
11 Telephone: (702) 990-3583  
12 *Attorney for Plaintiff*

/s/Marc J. Randazza, Esq.  
MARC J. RANDAZZA, ESQ.  
Nevada Bar No. 12265  
4035 South El Capitan Way  
Las Vegas, Nevada 89147  
Telephone: (702) 420-2001  
*Attorney for Defendant*

13 **IT IS SO ORDERED.**

14   
UNITED STATES DISTRICT JUDGE

15 Dated: February 9, 2016

16  
17  
18  
19  
20  
21  
22  
23  
The Amin Law Group, NV., Ltd.  
3960 Howard Hughes Parkway, Suite 500  
Las Vegas, NV 89109  
Phone: (702) 990-3583 / Fax: (702) 990-3501

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 3<sup>rd</sup> of February, 2016, I served a true and correct copy of:  
**STIPULATION AND (PROPOSED) ORDER TO STAY PROCEEDINGS (2<sup>nd</sup> Request),**  
postage fully prepaid and addressed to the following:

\_\_\_\_\_ serving the following parties via US Mail, postage prepaid;

  X   serving the following parties via CM/ECF;

\_\_\_\_\_ serving the following parties via facsimile;

\_\_\_\_\_ serving the following parties via Overnight Express;

Marc J. Randazza, Esq.  
3625 South Town Center Drive  
Las Vegas, NV 89135  
*Attorney for Defendant*

      /s/ Daniella Flandez        
Daniella Flandez  
An Employee of THE AMIN LAW GROUP, NV., LTD.

The Amin Law Group, NV., Ltd.  
3960 Howard Hughes Parkway, Suite 500  
Las Vegas, NV 89169  
Phone: (702) 990-3583 / Fax: (702) 990-3501